FREEDOM OF INFORMATION SUMMARY FOR

$SYNOVEX^{\otimes}$ PlusTM (Estradiol Benzoate and Trenbolone Acetate)

1. GENERAL INFORMATION

NADA Number: 141-043

Sponsor: Fort Dodge Animal Health

Div. of American Home Products Corp.

800 Fifth St. NW. Fort Dodge, IA 50501

Generic Name: Trenbolone Acetate and Estradiol Benzoate

Trade Name: Synovex[®] Plus

Marketing Status: Over-the-counter (OTC)

Effect of Supplement: This supplement provides for the implantation of Synovex[®] Plus

in steers fed in confinement for slaughter for increased rate of

weight gain.

2. INDICATIONS FOR USE

For increased rate of weight gain and improved feed efficiency in steers and for increased rate of weight gain in heifers fed in confinement for slaughter.

3. DOSAGE FORM(S), ROUTE OF ADMINISTRATION, AND RECOMMENDED DOSAGE

The dosage form is implantation. The route of administration is subcutaneous implantation on the posterior aspect of the middle one-third of the ear by means of an implant gun. The recommended dosage is one implant containing 200 mg trenbolone acetate (TBA) and 28 mg estradiol benzoate (EB). The implant consists of eight pellets with each pellet containing 25 mg TBA and 3.5 mg EB. Each implant is contained in one division of a ten dose cartridge. The cartridge is designed to be used with a Synovex implanting device.

4. EFFECTIVENESS

The effectiveness requirement for this supplemental new animal drug application for Synovex Plus in steers, with the indications for use and dosage as given in Sections 2 and 3 above, is met by utilizing the existing database in NADA 141-043 and conducting the additional adequate and well-controlled studies included in this supplemental application.

F015-2

NADA 141-043

Pivotal Studies:

A dose titration study was conducted at three sites using a uniform protocol such that the results could be pooled and summarized. The three sites were in major beef producing areas of the United States using management systems and diets typical of commercial feedlots.

Name and Address of Investigators:

James J. Sheldon, D.V.M., Ph.D. Sheldon Agri-business Casa Grande, AZ Study Location: El Centro, CA

Rodney L. Preston, Ph.D.
Texas Tech University
Department of Animal Science
Lubbock, TX
Study Location: New Deal, TX

Alvin Edwards, D. V. M., Ph.D. Kansas State University College of Veterinary Medicine Manhattan, KS Study Location: Lamar, CO

The purpose of the studies was to evaluate the dose response for TBA and EB on average daily gain (ADG) of steers fed in confinement for slaughter. The test animals were crossbred animals of Brahman, English, and Exotic breeds. For each study, 360 steers were randomized on the basis of weight into 5 blocks of 9 pens with 8 animals per pen, and administered one of the following treatments: 0/0, 0/300, 60/0, 14/100, 28/200, and 42/300 (mg EB/mg TBA). The steers weighed approximately 600 pounds when the studies were initiated. The duration of the studies ranged between 132 to 183 days.

Each steer was administered EB/TBA via subcutaneous implantation of the backside of the mid-ear. The control steers were not implanted. The steers were implanted once at the initiation of the study.

ADG data for the steers are summarized in Table 1 for each of the three dose titration studies.

A randomized compete block design was used for all studies and the data were pooled by analysis of variance to determine the significance of the effect of the EB/TBA implant on ADG. There was a significant (P< .05) dose effect on ADG with the response plateauing at a dose of 14 mgEB/100 mg TBA. The 28 mg EB/200 mg TBA dose was shown to be

significantly (P < .05) better than controls, 300 mg TBA alone, and 60 mg EB alone. These data are sufficient to support the claims and dosage as provided in Sections 2 and 3.

TABLE 1. SUMMARY FROM THREE DOSE TITRATION STUDIES COMPARING
THE EFFECT OF VARIOUS LEVELS OF TRENBOLONE ACETATE AND ESTRADIOL
BENZOATE ON AVERAGE DAILY GATN IN FEEDLOT STEERS

Location				
EB/TBA (mg)	Texas	Colorado	California	Pooled Average
0/0	2.26	3.41	3.10	2.93
0/300	2.53	3.66	2.96	3.06
60/0	2.65	3.66	3.36	3.23
14/100	2.89	3.87	3.38	3.38
28/200	2.82	3.86	3.59	3.43
42/300	2.87	4.08	3.59	3.52

The effects of treatment on yield grade, quality grade, marbling score, and liver abscess incidence were evaluated at slaughter. A decrease in marbling scores was observed. No effect of treatment was seen in yield grade or the incidence of liver abscesses. Because of the observed decrease in marbling scores, the following statement is required on the label: Studies have demonstrated that the administration of Synovex Plus can result in decreased marbling scores when compared to non-implanted steers.

5. TARGET ANIMAL SAFETY

Target animal safety is established by data in the parent application. Therefore, no further studies were required.

6. HUMAN SAFETY

Human safety is established by data in the parent application. Therefore, no further studies were required.

7. AGENCY CONCLUSIONS

Adequate data demonstrates the safe and effective use of Synovex[®] Plus for increased rate of weight gain when administered to steers fed in confinement for slaughter.

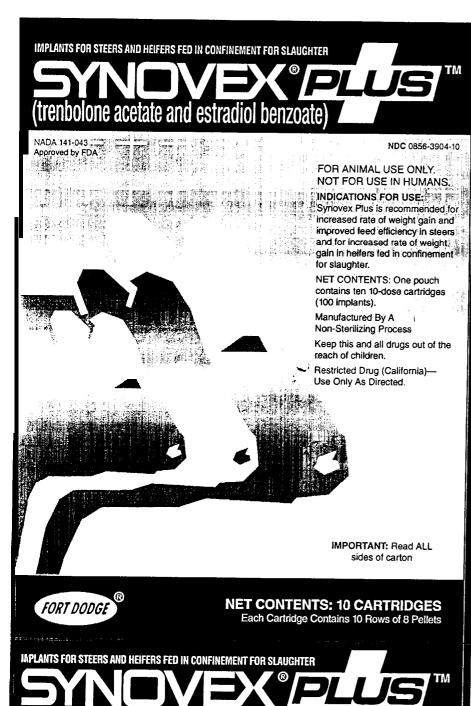
Under the Center's supplemental approval policy (21 CFR 514. 106(b)(2)), this is a Category II change providing for the implantation of Synovex[®] Plus in steers fed in confinement for slaughter. The approval of this change is not expected to have any adverse effect on the safety or effectiveness of this new animal drug. Accordingly, this approval did not require a reevaluation of the safety and effectiveness data in the parent application.

8. LABELING

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Three (3) pages of labeling are attached as follows:

- 1. Implant folding carton label
- 2. Implant fold-out labels of outer folding carton
- 3. Foil pouch label



(irenbolone acetate and estradiol benzoate)

CONFINEMENT FOR SLAUGHTER

IMPLANTS FOR STEERS AND HEIFERS FED IN CONFINEMENT FOR SLAUGHTER

(trenbolone acetate and estradiol benzoate)

LIMES !! STATE OF THE Synovex Plus (trenbolone acetate and estra- CAUTION: Bulling, vaginal and rectal prodiol benzoate) is a growth promoting implantic lapse, udder development, ventral edema and containing 200 mg of trenbolone acetate and relevated tailheads have occasionally been 28 mg of estradiol benzoate. Each implant reported in heifers administered Synovex Plus consists of 8 pellets. Ten implants are pro-implants.

yided in each cartridge.

DIRECTIONS: Implant complete contents of

NOTE: Studies have demonstrated that the administration of Synovex Plus can result in decreased lanted steers and when compared to non-imp

DOSAGE: One implant (eight pellets), containing 200 mg of trenbolone acetate and 28 mg of estradiol benzoate, is administered to each steer or heifer by subcutaneous implantation in the middle one-third of the ear.

The ten-dose cartridge of Synovex Plus is designed to be used exclusively with a Syrrovex implanting device.

WARNING: Not for dairy or beef replacement heifers. Implant pellets in ear only. Any other location is a violation of Federal law. Do not attempt salvage of impfanted site for human or animal food.

FOR ANIMAL USE ONLY. **NOT** FOR USE IN HUMANS. one cartridge ceil per steer or heifer. Approved implantation technique is fully described in the fold-out carton section.

NOTE: Never sacrifice careful, clean technique for speed of implantation.

STORAGE: Store unopened product at room temperature. Avoid excessive heat and humidity. Use product before the expiration date on the label.

Once the pouch is opened, unused product may be stored in the end-folded pouch (away from light) for up to six months under refrigerated conditions (2-8 °C/36-47°F) or at room temperature (t5-30°C/59-86°F) for up to one month.



Fort Dodge Animal Health Fort Dodge, Iowa 50501 USA

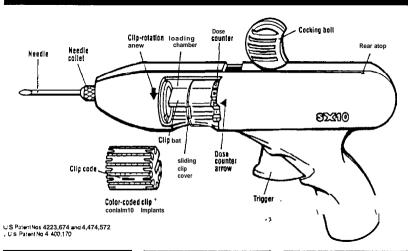


NET CONTENTS: 10 CARTRIDGES Each Cartridge Contains 10 Rows of 8 Pelles





SYNOVEX® SX10® Gun*



HOW TO IMPLANT

SYNOVEX*PLUS*

PELLETS

For Use With Any Synovex Gun.

Study the following instructions carefully, then proceed step by step, until the technique becomes routine. Many head can be implanted per hour by an experienced team, one member of which should be assigned to do nothing but the implantation, Care should be taken to insure the hands of the person administering the implant are clean and only sanitary instruments are

SYN©VEX*PLUS™ Implants

Synovex Plus is recommended for steers and heifers fed in confinement for

Wherr property administered. Synovex Plus implants increase rate of "weight gain and improve feed efficiency in steers and increase rate of weight gain

Store unopened product at room temperature. Avoid excessive heat and

humidity,
Use product before the expiration date 'Keep this and all drugs out 04 the reach of

Once the pouch is opened, unused children. product rnsy be stored in the end-folded Restricted Drug (California)pouch (away from light) for up to six Use Only as Directed.

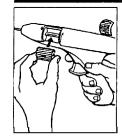
months under refrigeratedconditions (2-8°C/36-47°F) or at room temperature (15-30°C/59-86°F) for up to one month.

WARNING

Not for dairy on beef replacement heilers. Implant to added to in ear only. /Any other locafrom its a wightiom of Federali law. Do not attempt salvage of implanted site for human or animalfood.

When the needle is tom. pletely inserted, activate the instrument by squeezing the trigger completely. Do not withdraw the needle, but allow the automatic needle retractor 10 release the pellets. This will allow the@lets to be deposited in a straight line in the path of the retracted needle

STEP 1 Loading The SX10 Gun



Load the SX10 gun following the directions outlined in the instruction manual accomparrying each SX10 gun.

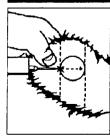
STEP 2 Restraint



The animal must be confined in a restraint mechanism (squeeze chute or head gate). Me implant site on the back of the ear should be prepared by scrubbing with a generous-sized piece of in a germicidal solution.

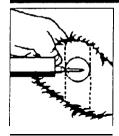
Note: If implanting horned cattle, greater Safety is provided when the head ISCORtrolled by the use of a bull lead (nose tongs).

STEP 3 Implant Site



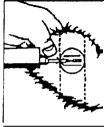
Divide the ear into three imaginary sections as illustrated. The implanted pellets should be deposited in the center one-third of the ear as shown. To accomplish this, the SX010 gum needle should be inserted in the outer one-third of the ear as indicated by the "X" in the illustration, implanting too close to they interest image cause abnormal sexual behavitur. Carre should be taken to avoid severing the major arteries of the ear.

STEP 4 Insert Needle



Just before grasping the ear with one hand, release the safety by striking the bun of the gun. Holding the SX10 aun firmly with the other hand, penetrate the skin at the point shown by the "X". Thrust the needs under the skin taking care not to pen. etrate the cartilage. Eeae me SX10 gun forward (toward the base of the ear) until the full needle length is beneath me skin.

STEP 5 Pellet Implantation





STEP 6 Inspection

Check the implantsite. If properly administered, the implants should tie in a straightline under the skin.

Disinfect me SX10 gun needle in a germicidal solution and raced me instrument by rotating me cocking grip left pull back, rotate right, then push all the way forward. You are now ready 10 inclant the next animal.



